

SEALED

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

CLEBIO PIO DE LIMA,

Defendant

Criminal No. 19-10042

Violations:

Count One: False Document
(18 U.S.C. § 1001(a)(3))

Count Two: False Statements
(18 U.S.C. § 1001(a)(2))

INDICTMENT

At all times relevant to this Indictment:

GENERAL ALLEGATIONS

1. The defendant, CLEBIO PIO DE LIMA (“DE LIMA”), was an illegal alien from Brazil living in Quincy, Massachusetts.

2. On or about February 5, 2018, the United States Citizenship and Immigration Services (“CIS”) received an unsigned letter written in Portuguese at their office in Boston, Massachusetts. The letter stated that an individual identified by the name of “Mario” was going to carry out an attack at a South Boston school. Specifically, the letter asserted:

He is preparing a large attack at a school here in Massachusetts. He will go to a school here in South Boston and open fire on all of the children; he has already purchased two firearms, automatic pistols and is looking to purchase more. He asked me to help him with this and said he would pay me 3,000 dollars to just drive him there and wait for him to flee after the attack. He just married a U.S. citizen and paid 15,000 dollars. He said he would get American documents to purchase more firearms and go through with his plan.

3. The letter concluded with the statement, “This is for you guys to take some action – I have confidence in you guys. Thank you for the great security of this country.”

4. In response to the letter, the Boston Federal Bureau of Investigation's Joint Terrorism Task Force opened an investigation to identify the individual and stop the attack.

COUNT ONE
False Document
(18 U.S.C. § 1001(a)(3))

The Grand Jury charges:

5. The Grand Jury re-alleges and incorporates by reference paragraphs 1 through 4 of this Indictment.

6. On or about February 5, 2018, in the District of Massachusetts, the defendant,

CLEBIO PIO DE LIMA,

did knowingly and willfully make and use a false writing and document, knowing the same to contain a materially false, fictitious, and fraudulent statement in a matter within the jurisdiction of the executive branch of the Government of the United States, that is, DE LIMA sent a letter to CIS falsely representing that an individual named “Mario” was going to attack a South Boston school.

All in violation of Title 18, United States Code, Section 1001(a)(3).

COUNT TWO
False Statements
(18 U.S.C. § 1001(a)(2))

The Grand Jury further charges:

7. The Grand Jury re-alleges and incorporates by reference paragraphs 1 through 4 of this Indictment.

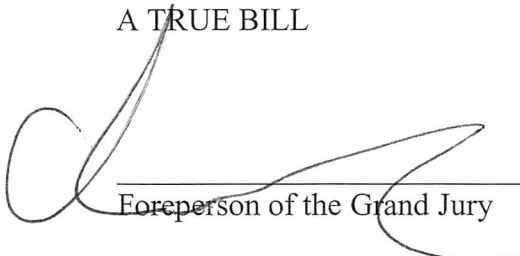
8. On or about September 19, 2018, in the District of Massachusetts, the defendant,

CLEBIO PIO DE LIMA,

did knowingly and willfully make materially false, fictitious, and fraudulent statements and representations in a matter within the jurisdiction of the executive branch of the Government of the United States, that is, DE LIMA falsely stated and represented to Task Force Officers of the FBI's Joint Terrorism Task Force that he had no knowledge of the February 5, 2018 letter sent to CIS, when in fact, he knew he had sent this letter to CIS.

All in violation of Title 18, United States Code, Section 1001(a)(2).

A TRUE BILL



Foreperson of the Grand Jury



GEORGE P. VARGHESE
Assistant United States Attorney

DISTRICT OF MASSACHUSETTS: February 5, 2019

Returned into the District Court by the Grand Jurors and filed.



Deputy Clerk

11-354